

REMARKS

Claims 1-45 are pending in the present application. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 102, Anticipation

The Examiner rejected Claims 1-8, 14-24, 29-38 and 44-45 under 35 U.S.C. § 102(b) as being anticipated by Walsh, *The Extensible Style Language: {XSL} Styling XML Documents*, Web Techniques, Jan 1999, vol. 4, iss. 1, pg. 49, 5 pgs, printed from ProQuest as pages 1-10. This rejection is respectfully traversed.

In general, and as will be shown in further detail below, the cited reference does not teach the claimed step of merging a plurality of subset style sheets to generate a composite style sheet that is used for transforming an electronic document. Rather, the cited reference describes a traditional XML document parsing technique using a tree structure.

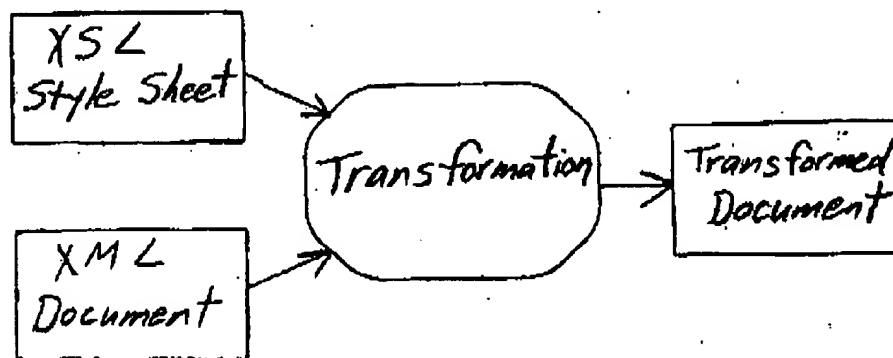
Specifically, Claim 1 recites:

A method of generating a composite style sheet used for transforming an electronic document, comprising:
 identifying a plurality of subset style sheets based on content of the electronic document; and
 merging the plurality of subset style sheets to generate the composite style sheet.

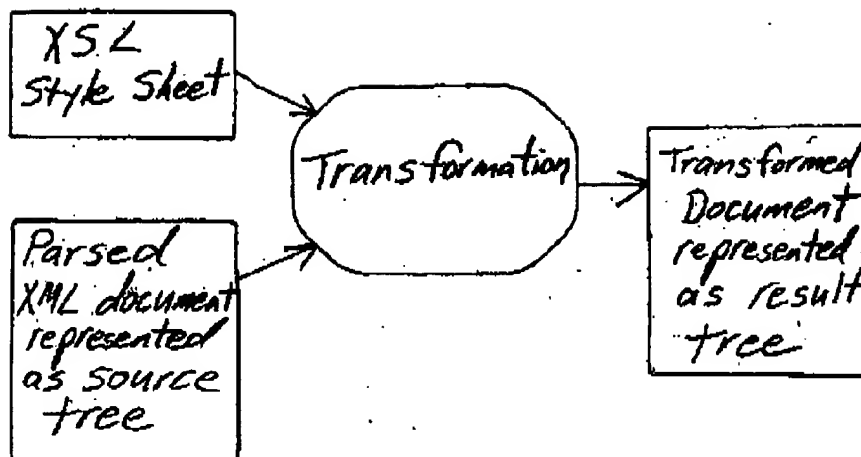
As can be seen, Claim 1 is directed to a method for generating a composite style sheet. The composite style sheet that is generated is *used for transforming an electronic document*. As a part of this generation of a composite style sheet - which is used for a traditional transforming of an electronic document such as is described by the cited Walsh reference - two steps are listed. First, a plurality of subset style sheets are identified based on content of an electronic document that is to be transformed. Next, these identified style sheets are merged to generate a composite style sheet. This composite style is used to transform this same electronic document. This use of the resulting composite style sheet to transform a document is similar to the teachings of the cited Walsh reference. However, and importantly, how this composite style is generated

is not described by Walsh, which merely assumes its pre-existence. Thus, the cited Walsh reference cannot teach the specifically recited steps of Claim 1 that are used to generate the composite style sheet, as Walsh merely describes a resulting use of a pre-existing style sheet without describing *how* such style sheet was generated. This will now be further described with reference to a few diagrams that will definitively establish that Walsh merely describes *use* of a pre-existing style sheet, but does not in any way described any method for *generating* such a style sheet, as per Claim 1.

As described by Walsh, and as described in the background section of the present application, style sheets are used to describe transformations from one document type to another (Walsh, page 2; see also the present patent specification, page 2, lines 2-14). One type of such a style sheet is an XSL style sheet specified in an extensible stylesheet language (XSL). An XSL style sheet specifies how an XML document is to be transformed for presentation, resulting in a different document (present patent specification page 2, lines 15-19). This process is graphically depicted below:



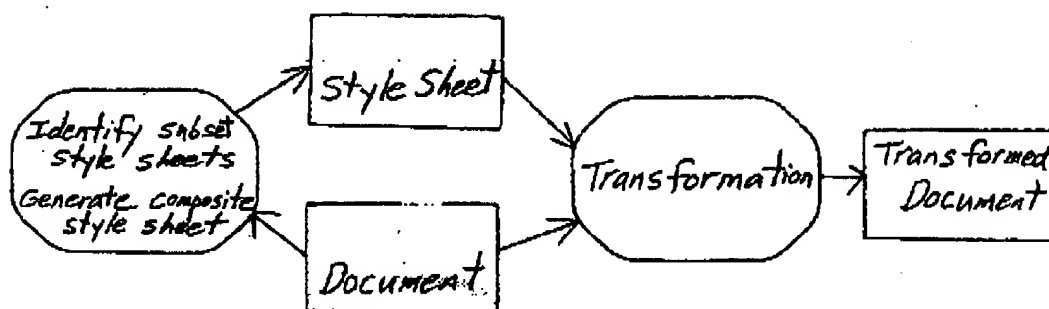
Coincidentally, this is the identical type of system described by the cited Walsh reference, although Walsh goes one step deeper into this description, and states that the XML document has been parsed, and thus is represented as a "source tree", and that the resulting transformed document is in the form of a "result tree". Thus, using Walsh terminology, the Walsh description is depicted as follows:



Walsh Description
of XSL Working
Group first Working
Draft

Yet, even with this additional detail, the overall process flow of Walsh is merely describing a traditional use of an XSL Style Sheet. Walsh confirms this, in stating that his document is a summary of the first Working Draft of the XSL Working Group (Walsh page 1, paragraph 5) – i.e. a standard/traditional XSL style sheet. Importantly, the generated result tree as described by Walsh is not then used to transform a document, as it is the transformed document.

In contrast, the present invention is directed to a specific technique *for generating* the style sheet itself (which is then used in transforming a document such as by using the above described technique). As a part of this style sheet generation methodology, the document to be transformed is used to identify a plurality of subset style sheets. Then, these plurality of subset style sheets are merged to generate a composite style that is used for transforming the electronic document. The claimed process, when used in an environment such as described by Walsh, is depicted as follows:



As can be seen by this depiction, and as expressly recited in Claim 1, the document that is to be transformed using a style sheet is first *used to identify subset style sheets*. These subset style sheets *are then merged to generate the composite style sheet that is used for transforming this same document*. In effect, Claim 1 is a front-end process directed to a specific technique for generating a style sheet, which may then be subsequently used in a traditional document transformation system such as described by Walsh. As every element of the claimed invention is not identically shown in a single reference, and in particular the identification and merging of subset style sheets to generate a composite style sheet, it is shown that Claim 1 is not anticipated by the cited reference.

Applicants initially traverse the rejection of Claims 2-8, 14 and 15 for reasons given above with respect to Claim 1 (of which Claims 2-8 depend upon).

Further with respect to Claim 2, Applicants urge that the cited reference does not teach the claimed feature of "wherein the plurality of subset style sheets includes a global style sheet and other subset style sheets, and wherein merging the plurality of subset style sheets includes inserting the other subset style sheets into the global style sheet to generate the composite style sheet". In rejecting Claim 2, the Examiner cites a passage in Walsh that describes an XSL processor beginning at a root node of a source tree and processes it. Applicants respectfully urge that this XSL processing is a part of the actual transformation of the XML document, and is not any part of generating a style sheet (which is then used to transform a document). Thus, the cited passage does not teach a further refinement of the subset style sheets that are recited in Claim 1, and in particular does not teach that these subset style sheets (which are merged to generate a composite style sheet that is used to transform a document) includes a global sheet to which the

other subset style sheets are inserted into to generate the composite style sheet. Thus, as every element of the claimed invention recited in Claim 2 is not identically shown in a single reference, it is further shown that Claim 2 has been erroneously rejected under 35 U.S.C. § 102(b).

Further with respect to Claims 3, Applicants urge that the cited reference does not teach the claimed feature of “converting a root template in each of the other subset style sheets to a child template”. In rejecting Claim 3, the Examiner alleges that Walsh teaches this claimed step when processing `xsl:process-children` which are substantiated when encountered. Applicants urge that the processing of children does not teach any type of conversion of a root template to a child template, as expressly recited in Claim 3. The fact that such children may have inherited information from an ancestor does not establish, either expressly or under principles of inherency, that a root template for each of the subset style sheets (as identified from the document to be transformed) is converted to a child template, as expressly recited in Claim 3. Thus, Claim 3 is further shown to have been erroneously rejected.

Further with respect to Claim 4, Applicants urge that the passage cited by the Examiner as teaching pattern matching is with respect to the actual document transformation using a style sheet. In contrast, the phrase matching as per Claim 4 is with respect to steps performed in the generation of the style sheet itself.

The rejection of Claim 6 further exemplifies the Examiner's erroneous interpretation of the teachings of Walsh. The Examiner correctly states that Walsh describes parsing an XML source document into a source tree representation. However, that is where the similarities end and where the erroneous interpretation begins. The scenario described on page 3 of Walsh describes the internal structure of a pre-existing XSL style sheet (Example 2), such preexisting style sheet being an XML document itself and having style sheet elements contained therein. It is certainly not possible to parse this preexisting XSL style sheet and then traverse the resulting tree in order to identify style sheet subsets that are then used *to generate the style sheet*, as the style sheet *already exists*. Such interpretation results in an interesting catch 22 situation – the style sheet to be generated is itself traversed to examine elements in order to identify subset style sheets that are then used to generate the style sheet that is itself being examined. This further

evidences that Walsh does not teach any pre-processing to generate a style sheet that is used to transform a document, but rather teaches traditional transformation of a document using a pre-existing style sheet.

Further with respect to Claim 14, Applicants urge that the cited reference does not teach the claimed feature of “wherein identifying a plurality of subset style sheets further includes identifying the plurality of subset style sheets based on characteristics of a client device to which the electronic document is to be sent”. In rejecting Claim 14, the Examiner states that Walsh teaches “SXL formatting objects ... Using these formatting objects, it will be possible to write style sheets that can be rendered on many different devices”, which implies the claimed feature recited in Claim 14. Applicants show two-fold error in this rejection of Claim 14. First, a statement of some future capability that may be provided by a currently non-existent formatting object is non-enabling. It is merely a statement of a possible future functionality. Second, this passage is with respect to *writing style sheets*. Claim 14 is specifically directed to *identification of style sheets* based on the characteristics of a device. The fact that a style sheet can be written to support a plurality of devices does not teach, either expressly or under principles of inherency, that style sheets *are identified* based on device characteristics. Thus, Claim 14 is further shown to have been erroneously rejected as all claimed features are not taught in a single reference.

Applicants traverse the rejection of Claims 16-24, 29-38 and 44-45 for similar reasons to those given above.

Therefore, the rejection of Claims 1-8, 14-24, 29-38 and 44-45 under 35 U.S.C. § 102 has been overcome.

II. 35 U.S.C. § 103, Obviousness

A. The Examiner rejected Claims 9, 31 and 39 under 35 U.S.C. § 103 as being unpatentable over Walsh, *The Extensible Style Language: {XSL} Styling XML Documents*, Web Techniques, Jan 1999, vol. 4, iss. 1, pg. 49, 5 pgs, printed from ProQuest as pages 1-10 in view of Boag et al. (US Pat No. 6,589,291 B1). This rejection is respectfully traversed.

With respect to Claim 9, Applicants initially traverse such rejection for similar reasons to those given above regarding Claim 1.

Further regarding Claim 9, Applicants urge that none of the cited references teach or suggest *a conditional generation of a composite style sheet*. The Examiner states that Boag's teaching of checking capabilities of supporting style processors implies checking the stored style sheets in a style sheet database of the user's device to see if the style sheet of the document is present. Applicants urge that even assuming *arguendo* that such statement is true (which Applicants do not admit), the resulting action that occurs based upon such alleged conditional checking is that either (1) the document is sent to the device with reference to the selected style sheet, or (2) a completely transformed document is sent. There is no teaching or suggestion of conditional, real-time generation of the style sheet itself based upon a determination of style sheet's non-existence. To establish *prima facie* obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974). Thus, it is further shown that Claim 9 has been erroneously rejected as all claimed limitations are not taught or suggested by the cited references.

Applicants traverse the rejection of Claims 31 and 39 for similar reasons to those given above with respect to Claim 9.

B. The Examiner rejected Claims 10, 25 and 40 under 35 U.S.C. § 103 as being unpatentable over Walsh as applied to Claim 2 above, and further in view of Feibus, Visual InterDev Improves, InformationWeek, September 28, 1998, Iss. 702, pg. 18A, 2 pgs, printed from ProQuest as pages 1-3. This rejection is respectfully traversed.

With respect to Claim 10, Applicants initially traverse such rejection for similar reasons to those given above regarding Claims 1 and 2.

Further regarding Claim 10, Applicants urge that none of the cited references teach or suggest the claimed feature of "wherein the global style sheet includes electronic document navigational information". In rejecting Claim 10, the Examiner states that Feibus discloses this claimed feature as Feibus teaches that technology from FrontPage 98 allows users to organize the Web documents in their site and automatically update the navigation-bar buttons that you can include as part of each documents' style sheet.

Applicants urge that Claim 10 is different from updating navigation-bar buttons that can be included as a part of each documents' style sheet. Specifically, Claim 10 is not merely about a style sheet, but rather pertains to a specific style sheet – a global style sheet – that is being used in a particular fashion – other style sheets are being merged into this global style sheet as a part of generating a composite style sheet. None of the cited references teach such a global style sheet (which has other subset style sheets inserted into it as a part of generating a composite style sheet) having electronic document navigational information, as expressly recited by Claim 10 in combination with Claim 2. Thus, as all claimed features are not taught or suggested by the cited references, it is shown that a prima facie case of obviousness has not been established with respect to Claim 10.

Applicants traverse the rejection of Claims 25 and 40 for similar reasons to those given above with respect to Claim 10.

C. The Examiner rejected Claims 11-13, 26-28 and 41-43 under 35 U.S.C. § 103 as being unpatentable over Walsh as applied to Claim 1 above, and further in view of Boag et al. (US Pat No. 6,589,291 B1). This rejection is respectfully traversed for similar reasons to those given above regarding Claim 1.

D. Therefore, the rejection of Claims 9-13, 25-28, 31 and 39-43 under 35 U.S.C. § 103 has been overcome.

III. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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